

# **EXHIBIT A**

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X  
5 E. JEAN CARROLL,

6 Plaintiff, Case No.

7 1:22-cv-10016-LAK-JLC

8 v.

9 DONALD J. TRUMP,

10 Defendant.  
11 -----X

12 CONFIDENTIAL VIDEOTAPED DEPOSITION

13 OF

14 E. JEAN CARROLL

15 Tuesday, January 31, 2023  
16  
17  
18  
19  
20  
21  
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23 REPORTED BY:

24 LINDA J. GREENSTEIN  
25

1 CONFIDENTIAL - E. JEAN CARROLL

2 Trump, and after the statements that were  
3 made publicly, you stated that you received  
4 death threats; correct?

5 How many?

6 MS. KAPLAN: This is not going  
7 to psychological injury in --

8 MS. HABBA: How does a death  
9 threat not go to psychological harm?

10 Are you going to not bring up  
11 the death threats?

12 MS. KAPLAN: It's about the  
13 statements. It's not about the  
14 assault.

15 MS. HABBA: She brought them up  
16 to the doctor. They're in the report.  
17 Read the report.

18 MS. KAPLAN: I'll let you answer  
19 this one. Let's see how it goes  
20 question by question.

21 E. Jean, how many death threats  
22 do you recall receiving after you  
23 publicly disclosed what Donald Trump  
24 did to you?

25 THE WITNESS: I don't remember.

1 CONFIDENTIAL - E. JEAN CARROLL

2 I was reading my emails late at night  
3 and my initial reaction was to delete  
4 them when I saw them. I don't recall.

5 Less than ten, but that's about  
6 all I remember.

7 MS. KAPLAN: And that's when you  
8 say that's from one night?

9 THE WITNESS: Two nights.  
10 Possibly three nights. The whole time  
11 I was staying in New York.

12 BY MS. HABBA:

13 Q. Did you ever send them to  
14 anybody?

15 A. I deleted them. I deleted them.

16 Q. You deleted them.  
17 You deleted all of them?

18 A. It was a natural reaction to get  
19 them away from me, I was like...

20 Of course, now I know better.

21 Q. You deleted them, but this is  
22 after you came out with the book publicly;  
23 correct?

24 A. Yes.

25 Q. Did you ever tell anyone in your